

Department of Public Health
and Human Services

Section:
APPLICATION PROCESSING

FOOD STAMP PROGRAM

Subject:
Verification

Supersedes: FS 103-5 (04/01/06)

References: 7 CFR 273.2(f); 7 CFR 273.2 (b)(1)(i)

GENERAL RULE -- Verification is the use of documentation or a contact with a third party to confirm the accuracy of statements or information. Households must be given at least 10 days to provide verification. If the last day to provide verification falls on a weekend or holiday, households are allowed through the next business day to submit the verification.

NOTE: Requests for verification listed on application and recertification approval notices are not considered 10-day request for verification notices. Also, the TEAMS notice X034, REDE INTERVIEW TANF/FS, is not considered a 10-day request for information notice. A separate notice after the interview but prior to authorizing benefits must be sent allowing the household at least 10 days to provide verification.

≥DUE DATES FOR VERIFICATION

If an application is being processed as expedited, the OPA Case Manager must send a TEAMS notice allowing the household at least 10 days or to the end of the expedited issuance period, whichever is longer to provide requested verification.

NOTE: Verification of identity must be provided before expedited benefits can be issued. Expedited benefits may be issued pending receipt of all other verification (FS 105-1).

If an application is being processed under regular processing procedures, the OPA Case Manager must send TEAMS notice F007, PEND APPL-REQUEST FOR INFO, allowing the household until the 30th day following the date of application or a minimum of 10 days, whichever is longer to provide requested verification.

Example 1: The application date is June 1st and the interview is held the same day. The OPA Case Manager sends TEAMS notice F007 allowing the household until July 1st to provide requested verification.

Example 2: The application date is June 1st. On June 26th the household completes its interview, and the OPA Case Manager sends a TEAMS notice F007 allowing the

household until July 6th (10 days) to provide requested verification.

When a recertification, interim report, or an ongoing case is being processed the OPA Case Manager must send a TEAMS notice allowing the household at least 10 days to provide requested verification.

TYPES/SOURCES OF VERIFICATION

Types of verification include:

1. **Documentary evidence** is written confirmation of a household's circumstances. **It is used as the primary type of verification for all items except residency and household composition.** Although documentary evidence is the primary type of verification, acceptable verification is not limited to any single type of document and may be obtained through the household or other source.

Sources of documentary evidence include but are not limited to: pay stubs, rental lease agreements, and utility bills.

The OPA Case Manager must document in case notes the source of the documentary verification, the information verified, and the date the verification was received.

2. **Collateral contact** is an oral confirmation of a household's circumstances by a person outside the household. The collateral contact may be made either in person or by telephone.

The OPA Case Manager may choose a collateral contact if the household does not designate one or designates one that is not acceptable. The OPA Case Manager should only disclose the information that is absolutely necessary to obtain the needed information. When talking to a collateral contact, the OPA Case Manager should try to avoid disclosing that the household is applying for food stamp benefits and try to avoid disclosing any information supplied by the household.

Sources of collateral contacts include but are not limited to: employers, landlords, social service agencies, and migrant service agencies.

If a collateral contact is used to verify information, the OPA Case Manager must document the name and phone number of the collateral contact, the information verified, and the date the information was verified.

Section: APPLICATION PROCESSING

Subject: Verification

3. A **home visit** may be used as verification only when documentary evidence is insufficient or cannot be obtained to make an accurate eligibility determination. A home visit must be scheduled in advance with the household.

RESPONSIBILITY OF PROVIDING VERIFICATION

The household has the primary responsibility for providing documentary evidence to support statements on the application and to resolve any questionable information. Households may provide verification in person, through the mail, fax, e-mail, or through an authorized representative. The OPA Case Manager will assist the household as long as the household is cooperating with the application process.

NOTE: A participant has authorized federal, state, and local agencies to verify information if needed to determine eligibility by signing the 'Application for Assistance', (DPHHS-HCS-250 and DPHHS-HCS-252). The 'Release of Information' form, (HCS-101), **is not required** but is a useful tool when businesses, agencies, etc. will not release information without a signed release of information statement by the participant.

VERIFICATION AT APPLICATION

For households applying for food stamp benefits, the following information must be verified **prior** to the eligibility determination and issuance for non-expedited processing of applications.

1. **Residency** - verify to the extent possible in conjunction with verification of other information. If verification cannot be accomplished in conjunction with the verification of other information such as rent/mortgage payment, a utility expense, identity, etc., the OPA Case Manager may use a collateral contact or other readily available documentary evidence.

There is no durational residency requirement. The household is not required to reside in a permanent dwelling, or have a fixed mailing address, or demonstrate intent to reside permanently in the state.

Applicants living anywhere in Montana for any purpose other than a vacation, regardless of the length of time they have been in Montana or plan to stay, meet residence requirements. Persons living in tents, vehicles, campers, under bridges, campsites, etc. meet residence requirements.

An application must not be denied if the OPA Case Manager and the household have made a reasonable effort to verify residency but verification is difficult to obtain.

2. **Identity** - verify the identity of the person making application. If an authorized representative applies on behalf of a household, the identity of both must be verified. Identity may be verified through readily available documentary evidence, or through a collateral contact.

Acceptable verification may include but is not limited to: driver's license, work or school I.D., I.D. for health benefits or for another assistance or social services program, birth certificate, Social Security card, and wage stub.

Any documents reasonably establishing the identity must be accepted and no requirement for a specific type of document such as a birth certification can be required. Only one document that establishes identity can be required.

3. **Eligible alien status** - verify the eligible status for each alien applicant.

Alien status is normally verified through U.S. Citizenship and Immigration Service (USCIS) Forms I-94, I-151, I-551, Passport, G-641, or I-688 (FS 301-2).

If an individual chooses not to provide verification of his/her alien eligible status and does not want the OPA Case Manager to contact USCIS to verify his/her immigration status, the household may choose to withdraw the application or to participate without that member's needs included in the benefit determination.

4. **Social Security Number (SSN)** - verified through the agency system interface between TEAMS and Social Security Administration. Hard copy verification of a SSN is not required.

Providing a Social Security number (SSN) for each household member is voluntary. However, if a SSN is not provided, the individual cannot participate in the Food Stamp Program unless the individual meets good cause (FS 303-1).

The determination of eligibility or issuance of benefits must not be delayed to an otherwise eligible household solely to verify the SSN of a household member. Once a SSN is verified the OPA must make a permanent notation in its file to prevent the unnecessary re-verification of the SSN in the future.

If an individual does not have or is unable to provide a SSN and wants to participate in the Food Stamp Program, the individual must apply for a SSN.

If the household is unable to provide proof of application for a SSN for a newborn, the household must provide the SSN or proof of application at its next recertification or within six months following the month the baby is born, whichever is later. If the household is unable to provide a SSN or proof of application for a SSN within those time frames, the OPA Case Manager will determine if good cause is applicable (FS 303-1).

Generally, the SSN application process begins while the mother is still in the hospital. If a SSN application is made for a newborn prior to the mother leaving the hospital, the application for a SSN from the hospital is acceptable verification.

5. **Household composition** - verify factors affecting the composition of a household, **if questionable**.
6. **Disability** - verify the individual meets the definition of disabled as defined in the glossary (FS 0-4).

Acceptable verification includes but is not limited to the participant receiving Supplemental Security Income (SSI), Social Security disability/blindness benefits, or Veterans Administration (VA) benefits due to being 100% disabled.

7. **Student status** - verify eligible student status (FS 201-5).
8. **Gross non-exempt income** - verify all income that is not exempt.

The household's statement is accepted as verification of interest income when the household reports its interest income is \$10 or less per month or \$120 or less per year.

Acceptable verification includes but is not limited to: pay stubs, W-2 forms, employer wage verification form, income tax forms and returns, bookkeeping records, sales and expenditure records, award letters (unemployment insurance, Veteran's Administration, pensions, Railroad Retirement); support and alimony payments (court order, divorce decree, or separation papers); contribution checks; benefit warrants, current SDX and BENDEX interfaces, SEARCHS, and MISTICS for Montana unemployment insurance (FS 500 through FS 503-2).

≥

The household must identify a collateral contact for the OPA Case Manager to contact to obtain the verification if the household cannot provide acceptable documentary proof of income. When all attempts to verify the income are unsuccessful because the person or organization providing the income does not cooperate with the household or the OPA and all other sources of verification are not available, the OPA Case Manager determines the amount to be prospectively budgeted based on the best available information.

9. **Deductible expenses:**

NOTE: The expense is not allowed if the expense is not reported and/or verified. The OPA Case Manager will assist the household with obtaining verification as long as the household is cooperating with the application process.

- a. **Child support obligation** - verify the household's legal obligation to pay child support, the obligation amount, and monthly amount of child support the household actually pays.

Acceptable verification may include but is not limited to: canceled checks, wage withholding statements, verification of withholding from unemployment compensation, statements from custodial parent, and SEARCHS (FS 602-2).

- b. **Medical expenses** - verify medical expenses including the amount of the reimbursement (FS 602-3).

When documentary evidence cannot be obtained or is insufficient to make a determination for the amount of the deduction, the OPA Case Manager should reasonably attempt to verify information with a collateral contact (FS 602-3).

- c. **Shelter expenses** - verify all allowable shelter expenses (FS 602-4).
- d. **Utility expenses** - verify the household's obligation to pay for heating, cooling, cooking fuel, electricity, water, sewage, garbage, and telephone expenses including charges for initial installation of the utility.

Acceptable verification includes but is not limited to: utility bills, canceled checks, copies of money orders, landlord form, etc. (FS 602-4).

- e. **Dependent care** - verify payments to the day care provider including reimbursements for the actual costs for the care of children or other dependents when necessary for a household member to accept or continue employment, seek employment, comply with employment or attend training, or pursue education preparing for employment (FS 602-2).
10. **Questionable information** - verify all information that is inconsistent, incomplete, or outdated information.
- a. **Inconsistent information** - the household's statements on the application or during the interview are contradictory, do not agree with information in the case file/TEAMS, or do not agree with information the OPA Case Manager knows to be factual.
- The household must be given at least 10 days to resolve the discrepancy prior to an eligibility determination when information from another source contradicts statements made by the household.
- b. **Incomplete information** - gaps in information that are facts.
 - c. **Outdated information** - is information too old to be considered valid. It depends on the particular piece of information in question whether or not it is considered outdated.

VERIFICATION AT RECERTIFICATION

Unchanged information does not need to be verified at recertification unless the information is incomplete, inaccurate, inconsistent or outdated. The following information is verified:

- 1. Change(s) in income if the source has changed or the amount has changed by more than \$50. Verification of income is not required if the source has not changed and if the amount is unchanged or has changed by \$50 or less unless the information is incomplete, inaccurate, inconsistent or outdated.

NOTE: Generally, income that fluctuates from month to month changes more than \$50 and is verified at recertification.

2. Previously unreported utility expenses, utility expenses if the source changed, and previously reported but not verified utility expenses. Verification of utility costs claimed by the household that has not changed is not required unless the information is incomplete, inaccurate, inconsistent, or outdated.
3. Previously unreported medical expenses and total recurring medical expenses that changed by more than \$25. Verification of total medical expenses claimed by the household that have not changed or have changed by \$25 or less is not required unless the information is incomplete, inaccurate, inconsistent, or outdated.
4. Change(s) in the household's legal obligation to pay child support, the obligation amount, and monthly amount of child support the household actually pays to a non-household member. Verification of reported unchanged information is not required to be verified unless the information is incomplete, inaccurate, inconsistent or outdated.
5. An able bodied adult without dependents must have work hours verified if he/she is meeting the work requirement by working, participating in the Food Stamp Employment and Training program or by participating in a work program that is not operated or supervised by the state.
6. Other information that has changed, such as rent/mortgage, home-owner's insurance, property taxes, dependent care, student status, fleeing felon, drug conviction, etc. Unchanged information is not required to be verified unless the information is incomplete, inaccurate, inconsistent or outdated.

Example: An elderly household receiving housing assistance has her annual housing review every March. The household reports and verifies in March a rent increase for April. The household's food stamp recertification is October. The household states during the interview the rent is the same amount as reported in March. The rent does not have to be verified because the expense was previously verified and the information is not incomplete, inaccurate, inconsistent or outdated.

TP